

*Tracy Caekaert and Camillia Mapley v
Watchtower Bible and Tract Society of New York, Inc.*

*Shirley Gibson
April 14, 2022*

*Charles Fisher Court Reporting
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Min-U-Script® with Word Index

Exhibit B

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MONTANA
3 BILLINGS DIVISION
4 TRACY CAEKAERT, and
5 CAMILLIA MAPLEY,
6 Plaintiffs, Case No. CV-20-52-BLG-SPW
7 vs.
8 WATCHTOWER BIBLE AND TRACT
9 SOCIETY OF NEW YORK, INC.,
10 WATCH TOWER BIBLE AND
11 TRACT SOCIETY OF
12 PENNSYLVANIA, and BRUCE
13 MAPLEY SR.,
14 Defendants.
15 WATCHTOWER BIBLE AND TRACT
16 SOCIETY OF NEW YORK, INC.,
17 Cross Claimant,
18 BRUCE MAPLEY, SR.,
19 Cross Defendant.
20 _____
21 ARIANE ROWLAND, and JAMIE
22 SCHULZE Cause No. CV 20-59-BLG-SPW
23 Plaintiff,
24 vs.
25 WATCHTOWER BIBLE AND TRACT

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1 SOCIETY OF NEW YORK, INC.
2 and WATCH TOWER BIBLE AND
3 TRACT SOCIETY OF
4 PENNSYLVANIA,
5 Defendants.
6 _____
7 VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
8 UPON ORAL EXAMINATION OF
9 SHIRLEY GIBSON
10 _____
11 BE IT REMEMBERED, that the
12 videoconference/videotaped deposition upon oral
13 examination of Shirley Gibson, appearing at the
14 instance of the Plaintiffs, was taken at 800 North
15 Last Chance Gulch, Suite 101, Helena, Montana, on
16 Thursday, April 14, 2022, beginning at the hour of
17 9:07 a.m., pursuant to the Federal Rules of Civil
18 Procedure, before Mary R. Sullivan, Registered
19 Merit Reporter, Certified Realtime Reporter, and
20 Notary Public.
21
22
23
24
25

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1 A P P E A R A N C E S
2
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12
13
14 **ALSO PRESENT:** Jessica Yuhas (Via Zoom)
15 Jordan Brannen (Via Zoom)
16 Carisa Fisher, Videographer
17
18
19
20
21
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23
24
25

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1	S T I P U L A T I O N S	
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3	It was stipulated by and between	
4	counsel for the respective parties that the	
5	deposition be taken by Mary R. Sullivan, Freelance	
6	Court Reporter and Notary Public for the State of	
7	Montana, residing in Missoula, Montana.	
8		
9	It was further stipulated and agreed by	
10	and between counsel for the respective parties	
11	that the deposition be taken in accordance with	
12	the Federal Rules of Civil Procedure.	
13		
14	It was further stipulated and agreed by	
15	and between counsel for the respective parties and	
16	the deponent that the reading and signing of the	
17	deposition would be expressly reserved.	
18		
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1 THURSDAY, APRIL 14, 2022

2 **THE VIDEOGRAPHER:** This is the

3 video-recorded and videoconference deposition of

4 Shirley Gibson taken in the United States District

5 Court for the District of Montana, Billings

6 Division, Cause No. CV-20-52-BLG-SPW,

7 Tracy Caekaert and Camillia Mapley vs. Watchtower

8 Bible and Tract Society of New York, Inc., et al.,

9 and Cause No. CV-20-59-BLG-SPW, Ariane Rowland,

10 and Jamie Schulze vs. Watchtower Bible and Tract

11 Society of New York, Inc., et al.

12 Today is April 14th, 2022. The time is

13 9:08 a.m. Mountain Time.

14 We are present at the offices of Fisher

15 Court Reporting at 800 North Last Chance Gulch,

16 Suite 101, in Helena, Montana.

17 The court reporter is Mary Sullivan, and

18 the video operator is Carisa Fisher of Fisher

19 Court Reporting.

20 The deposition is being taken pursuant to

21 notice.

22 I would now ask the attorneys to identify

23 themselves, who they represent, and whoever else

24 is present. Also for the remote attorney, where

25 you are appearing from.

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1 **MR. SHAFFER:** This is Ryan Shaffer on

2 behalf of the plaintiffs in both cases.

3 Did we get both cases on the record?

4 **THE VIDEOGRAPHER:** Yes.

5 **MR. SHAFFER:** Thank you. I believe

6 paralegal Jessica Yuhas is logged in, and

7 potentially attorneys James Murnion and

8 Rob Stepan also on behalf of all the plaintiffs.

9 **MR. JENSEN:** Brett Jensen appearing on

10 behalf of Watchtower Bible and Tract Society of

11 New York, Inc. Also appearing remotely is our pro

12 hac vice counsel Joel Taylor.

13 **MR. SWEENEY:** Chris Sweeney for Watch

14 Tower Bible and Tract Society of Pennsylvania.

15 Jordan Fitzgerald of Moulton Bellingham is also

16 attending remotely. He is in Billings.

17 Thereupon,

18 SHIRLEY GIBSON,

19 a witness of lawful age, having been sworn to tell

20 the truth, the whole truth, and nothing but the

21 truth, testified as follows:

22 **EXAMINATION**

23 **BY MR. SHAFFER:**

24 **Q. Good morning, Ms. Gibson.**

25 **A. You can call me Mapley. I --**

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1 A. Yes.

2 **Q. Why do you say 1977? You fairly -- How**
3 **do you feel about that number, that year? Pretty**
4 **certain about that?**

5 A. Yes.

6 **Q. Tell me why.**

7 A. Because it was brought to my attention
8 all this stuff had happened, and I --

9 **Q. How -- How was it brought your attention?**

10 A. Well, because of Gunner Hain, it came
11 out. He was reprov'd, but they didn't do anything
12 to Bruce 'cause he -- Anyway. I was told what had
13 happened, and then Bruce admitted he had too,
14 so -- but they didn't do anything with Bruce but
15 they did something -- they -- Gunner Hain was
16 reprov'd is all.

17 **Q. Who told you that?**

18 A. Harold Rimby.

19 **Q. And so when you say this came out in**
20 **1977, that -- that -- Harold Rimby told you**
21 **personally --**

22 A. Yes.

23 **Q. -- about Gunner Hain.**

24 A. And my ex-husband.

25 **Q. And your ex-husband molesting Gunner's**

1 **opposed to 1978?**

2 A. Because it was the year after we were
3 baptized.

4 **Q. Okay. So you feel -- you're certain**
5 **about that number, 1977.**

6 A. (Nods head.)

7 **Q. Yeah. Where were you when you had this**
8 **conversation with Mr. Rimby?**

9 A. In our home at Fort Smith.

10 **Q. Who else was there?**

11 A. My ex-husband.

12 **Q. So just the three of you?**

13 A. Yeah. Well, my children were there, too.

14 **Q. Okay. And had Mr. Rimby announced he was**
15 **going to come over to have this conversation with**
16 **you or did he just show up, or how'd that happen?**

17 A. I guess just showed up. I don't
18 remember. We didn't make announcements; we just
19 came --

20 **Q. Okay.**

21 A. -- to each other's homes.

22 **Q. I take it it was a surprise. It was**
23 **shocking.**

24 A. Yes.

25 **Q. Is that fair?**

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1 **stepdaughter. Gunner had molested his**
2 **stepdaughter and Tracy.**

3 A. (Nods head.)

4 **Q. How did Mr. Rimby know that?**

5 **MR. SWEENEY:** Objection. Speculation.

6 A. Do I still answer?

7 **BY MR. SHAFFER:**

8 **Q. Yeah, go ahead. Yeah.**

9 A. Well, because Gunner told Harold.

10 **Q. And then Harold told you.**

11 A. Yes.

12 **Q. Okay. Sounds like Harold told you about**
13 **Gunner. Did -- In -- In the same conversation he**
14 **told you that Bruce had done the same thing?**

15 A. Yes.

16 **Q. And do you know how Harold knew**
17 **that -- that Bruce had molested Tracy?**

18 **MR. SWEENEY:** Objection. Speculation.

19 **BY MR. SHAFFER:**

20 **Q. Go ahead. It's okay.**

21 A. Well, Bruce admitted to Harold that he
22 had.

23 **Q. Okay. And then Harold told you.**

24 A. Yes.

25 **Q. Okay. In 1977 -- Why do you say 1977 as**

1 A. And the first thing I said was "We need
2 to call the authorities."

3 And Harold said, "I'll take care of it."

4 **Q. Okay.**

5 A. So I assumed he would, but he didn't.

6 **Q. Okay.**

7 A. I mean, maybe he did. He didn't call the
8 authorities, though. And that was my mistake.

9 **Q. Was Harold an elder at that point?**

10 A. Yes.

11 **Q. And you're new to the church at that**
12 **point in time.**

13 A. Yes.

14 **Q. You understood that if Harold -- Harold**
15 **was essentially directing how to take care of this**
16 **situation. Is that right?**

17 A. Yes.

18 **Q. And would there be a consequence to you**
19 **as a member if you did -- if you disobeyed**
20 **Mr. Rimby's command to not tell the authorities?**

21 A. No, there wouldn't have been a problem.
22 I just assumed he was going to do it. He said he
23 was.

24 **Q. He said he was going to tell the**
25 **authorities or he was going to handle it?**

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1 A. He was going to handle it.
 2 **Q. Okay. So he didn't say he was going to**
 3 **tell the authorities.**
 4 A. No, but I thought that's what he would
 5 do.
 6 **Q. I see. And if he had done -- Let's say**
 7 **he -- Let's say he told you not to, did you**
 8 **understand you could go to the authorities if you**
 9 **wanted to?**
 10 A. Yeah. He didn't tell me I couldn't, but
 11 I assumed he was going to take care of it.
 12 **Q. Okay.**
 13 A. And I should have done it.
 14 **Q. When did you -- When did you follow up**
 15 **with him on that?**
 16 A. I never had any contact with -- I mean, I
 17 never had any more conversations with him or
 18 anybody else about it after that.
 19 **Q. Okay. Did other people in the**
 20 **congregation know that Gunner had molested Tracy**
 21 **and Ronda?**
 22 A. Yes.
 23 **Q. How did they find out about it?**
 24 A. Same way I did, I guess. I never asked
 25 them.

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1 **Q. Okay. Who -- Can you identify other**
 2 **people who knew about it by name?**
 3 A. Martin Svenson, James Rowland,
 4 Joyce Hains, June Rimby. All deceased now.
 5 **Q. Mm-hmm. Anyone else that you know that**
 6 **knew about it?**
 7 A. No.
 8 **Q. Were you permitted to tell people about**
 9 **it?**
 10 A. I could have, but I didn't.
 11 **Q. Okay. So you understood that you could,**
 12 **you could have gone to the authorities or you**
 13 **could have told people about it, but you didn't.**
 14 A. Yes.
 15 **Q. You chose not to.**
 16 A. I chose not to.
 17 **Q. Okay.**
 18 A. It was a mistake.
 19 **Q. Sorry?**
 20 A. Was a mistake.
 21 **Q. Okay. And had you ever been taught as a**
 22 **member of the church that the elders direct how to**
 23 **handle situations like wrongdoing within the**
 24 **congregation?**
 25 A. Yes.

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1 **Q. Okay. Tell me about that. When were you**
 2 **taught that?**
 3 A. I suppose during my studies. I
 4 don't -- I don't remember where I learned it. I
 5 mean, it's just something we do.
 6 **Q. How was it supposed to work, then? So**
 7 **there's -- there's alleged wrongdoing in the**
 8 **church. How is it supposed to work? What are --**
 9 **What are you supposed to do with that information?**
 10 A. Okay. You go to the elders.
 11 **Q. Okay.**
 12 A. You have a sit-down with them, tell them
 13 the situation, and they take care of it.
 14 **Q. And they're in charge of handling that,**
 15 **right, at that point?**
 16 A. Yes.
 17 **Q. It's out of your hands.**
 18 A. Yes.
 19 **Q. Okay.**
 20 A. Well, I mean, unless they need more
 21 information.
 22 **Q. Okay. And is there a process that the**
 23 **elders are supposed to use to determine if**
 24 **wrongdoing has occurred?**
 25 A. I don't know how they handle it. I know

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1 they discuss it, and I don't -- I don't know.
 2 **Q. Yeah. Right. Is it a process, though,**
 3 **that as a member you've -- you come to trust this**
 4 **process, you're taught this process if there's**
 5 **wrongdoing, you take it to an elder and you trust**
 6 **it's going to be handled. Right?**
 7 A. Yes.
 8 **Q. Okay. And that's what you're taught as a**
 9 **member.**
 10 A. Yes.
 11 **Q. Okay. Did you know Mr. Hain?**
 12 A. Yes, I did.
 13 **Q. And did he voluntarily go to Mr. Rimby**
 14 **and the elders to say, "Hey," --**
 15 A. I have no idea.
 16 **Q. -- "I molested" --**
 17 A. I never asked.
 18 **Q. So you don't know how that came about.**
 19 A. Hm-mmm.
 20 **Q. And do you know what brought about**
 21 **Bruce's decision to tell Mr. Rimby that he had**
 22 **been molesting Tracy?**
 23 A. I don't know what his reason was.
 24 Probably because he'd molested other girls, too,
 25 so -- I don't know that for sure, but...

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1 A. I assumed they had because Gunner was
2 publicly reprov'd, and, of course, nothing was
3 done to Bruce 'cause he'd just been baptized so, I
4 mean, he was still a publisher, but I -- I guess
5 that's -- I don't know. I'm really getting
6 confused.

7 **Q. Well, as you sit here today, did -- did**
8 **the church prevent Bruce from continuing to molest**
9 **Camie or Tracy?**

10 A. Well, if they didn't know, how could they
11 do anything?

12 **Q. Mr. Rimby knew, didn't he?**

13 A. Mr. Rimby did, but apparently he did not
14 contact the organization in New York.

15 **Q. Do you know that? Do you know who**
16 **Mr. Rimby told?**

17 A. No.

18 **Q. Okay. Mr. Rimby told you he was handling**
19 **it. Did he handle it appropriately? Did he**
20 **resolve the problem of Bruce molesting Tracy?**

21 A. You know, that's a hard question because
22 people lie to each other, and if Bruce said he
23 wasn't going to do it again, maybe Harold did what
24 I did, believed it.

25 **Q. Yeah. Right. Right.**

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1 A. So how could we control --

2 **Q. Sure.**

3 A. -- what he did?

4 **Q. Sure. Yeah.**

5 A. I don't think the organization should be
6 responsible for somebody's conduct.

7 **Q. I understand, yeah.**

8 **Do you know what Mr. Rimby did, if**
9 **anything?**

10 A. No, I do not.

11 **Q. So you don't know if he did anything with**
12 **the information you gave him.**

13 A. No.

14 **Q. But you did trust that was the proper way**
15 **to handle it. Correct?**

16 A. Yes.

17 **Q. Okay. Tell me about that. Why did you**
18 **trust that that was the proper way to handle it?**

19 A. Well, because Jehovah has an
20 organization. He's appointed men to shepherd our
21 congregation, take care of us.

22 **Q. Those men being the elders.**

23 A. Yes.

24 **Q. In your experience with the church, have**
25 **you -- have you been able to observe how members**

1 **who admit to wrongdoing are -- are -- I don't want**
2 **to say punished, but maybe that's the right word,**
3 **I don't know. Is that -- I'll use the word**
4 **"punished." Have you been able to observe how**
5 **members of the church are punished if they've done**
6 **something wrong?**

7 A. Yes, I've seen that. I mean --

8 **Q. Yeah.**

9 A. -- yeah.

10 **Q. What does that look like? Tell me about**
11 **it. How do you know if somebody's being punished?**

12 A. Well, they're either put on reproof or
13 disfellowshipped, and we -- they lose their
14 privileges of answering at the congregation,
15 reading, you know, different one. It depends on
16 the degree of what they've done and how repentant
17 they are.

18 **Q. That makes sense. What's a reproof?**

19 A. You know, just like when you tell your
20 son or daughter to do something, they don't do it,
21 and what do you do? What punishment do you give
22 them? No TV for a day, whatever, you know.

23 **Q. I take their iPad away for a day.**

24 A. That's a new one, yes.

25 **Q. But I don't know what a reproof is.**

1 **That's a new word to me.**

2 A. Well, maybe I'm using the wrong word now,
3 but I don't know.

4 **Q. Well, tell me -- I mean, that was your**
5 **word. I assume you had -- it's got a meaning in**
6 **your head. I just want to try to understand it a**
7 **little bit. Does it mean you pay --**

8 A. Well, that person --

9 **Q. Sorry, I'm talking over you.**

10 A. Okay. So I -- it's never happened to me
11 so I don't know, but what I've seen with what
12 happened to my ex-husband, the elders discuss the
13 situation, they talk to the brothers in New York
14 or somebody in, you know, a committee. Then they
15 decide what punishment will be given to the
16 person. And then -- then the congregation is
17 announced that this person has been reprov'd or
18 disfellowshipped. They don't use disfellowshipped
19 anymore. They're just no longer part of the
20 congregation of Jehovah's Witnesses.

21 **Q. Okay. So it sounds like the word**
22 **"reproof" is kind of a word that can encompass a**
23 **lot of things. It's basically when somebody's**
24 **either been determined to have committed a**
25 **wrongdoing or confessed to a wrongdoing in the**

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1 work, so he was going to find another one. He
 2 said he would call and talk to them.
 3 **Q. And -- And was it because you had**
 4 **received some legal paperwork? What was the**
 5 **reason why you wanted to call?**
 6 A. I had been served with the deposition, so
 7 I --
 8 **Q. Aha.**
 9 A. -- called and talked to him.
 10 **Q. Okay. So you got -- you got this notice**
 11 **to appear here today, and you wanted to know what**
 12 **to do with it.**
 13 A. Yes.
 14 **Q. And you never heard back from anyone at**
 15 **Watchtower.**
 16 A. Not from there or Ray Sewell.
 17 **Q. Okay. As -- As one of Jehovah's**
 18 **Witnesses, is there any aspect of your worship**
 19 **that is not voluntary?**
 20 A. No.
 21 **Q. Is all of it voluntary?**
 22 A. Yes.
 23 **Q. Can the elders stop you from doing**
 24 **something?**
 25 A. No.

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1 **Q. Can the elders make you do something?**
 2 A. No.
 3 **Q. I have no further questions. I want to**
 4 **defer to Chris. Thank you so much.**
 5 **MR. SWEENEY:** I only have a -- We'll take
 6 a break.
 7 **THE VIDEOGRAPHER:** Let's go off the
 8 record. It's 1:54.
 9 (Recess taken from 1:54 p.m. to
 10 1:59 p.m.)
 11 **THE VIDEOGRAPHER:** We're back on the
 12 record now. It's 1:59 p.m.
 13 **EXAMINATION**
 14 **BY MR. SWEENEY:**
 15 **Q. Shirley, my name is Chris Sweeney. I**
 16 **represent the other defendant in this matter, the**
 17 **Watch Tower Bible and Tract Society of**
 18 **Pennsylvania, and I just have a few questions for**
 19 **you. I wanted to start by looking at your**
 20 **affidavit again and talking to you about how this**
 21 **came about.**
 22 **I understand that this affidavit was**
 23 **requested by the investigator Todd. Do I have**
 24 **that right?**
 25 A. Yes. Yes.

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1 **Q. Did either -- Did any of your children**
 2 **ever contact you and ask you to prepare this**
 3 **affidavit?**
 4 A. No.
 5 **Q. And I think you said that you prepared**
 6 **this three years ago, but it looks like it's dated**
 7 **March 26th, 2020, or at least that's the date you**
 8 **signed it.**
 9 **So my first question is, how many times**
 10 **have you spoken to Todd?**
 11 **MR. SHAFFER:** I'm objecting to form to
 12 the extent it misstates her testimony.
 13 Go ahead.
 14 A. Oh, probably three times.
 15 **BY MR. SWEENEY:**
 16 **Q. When was the first time?**
 17 A. I don't remember what year it was.
 18 **Q. It looks like this affidavit was signed**
 19 **in March of 2020. Does that jog your memory at**
 20 **all as to when you first talked to Todd?**
 21 A. Might have been. He called me on the
 22 phone. I was out in field service that day, so I
 23 had to leave field service to visit with him.
 24 **Q. And do you remember what was discussed?**
 25 A. He just asked me to tell the -- what I

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1 knew, and I did.
 2 **Q. At -- You believe you had three**
 3 **phone -- or three conversations with Todd?**
 4 A. I believe it was three.
 5 **Q. Were they all on the phone?**
 6 A. Yes.
 7 **Q. Was it always just you and him or were**
 8 **there others involved in any of those**
 9 **conversations?**
 10 A. Just him and I.
 11 **Q. And did those all take place before you**
 12 **signed the affidavit?**
 13 A. Yes.
 14 **Q. Have you talked to Todd since you've**
 15 **signed the affidavit?**
 16 A. No. He left me a voicemail to tell me
 17 that the subpoena would be in the -- so I haven't
 18 talked to him, but he left a voicemail that there
 19 was a subpoena coming.
 20 **Q. Okay. So the first time he called you**
 21 **were in the middle of field service and you spoke**
 22 **to him. Tell me the details of what was**
 23 **discussed.**
 24 A. I just told him exactly what I told in
 25 this whole thing. What happened from '77 on.